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Attorneys for Defendant NAVIENT SOLUTIONS, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

THOMAS A. LARMORE,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS,
INC; TRANSUNION, LLC; NAVIENT
SOLUTIONS, LLC D/B/A NAVIENT,

Defendants.

Case No. 2:18-CV-02349-RFB-VCF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR NAVIENT
SOLUTIONS, LLC TO FILE AN
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF’S COMPLAINT**

(FIRST REQUEST)

Plaintiff THOMAS A. LARMORE (“Plaintiff”) and Defendant NAVIENT SOLUTIONS, LLC (“NSL”), by and through their respective counsel, stipulate and agree to extend the deadline from January 3, 2019 to January 25, 2019, for NSL to File an Answer or Otherwise Respond to Plaintiff’s First Amended Complaint (ECF No. 4).

On December 11, 2018, Plaintiff filed his Complaint (ECF No. 1). On December 12, 2018, Plaintiff filed his First Amended Complaint. The claims at issue necessitate additional time for fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so that it can meaningfully respond to the specific allegations contained in Plaintiff’s First Amended Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action, and therefore requires additional time to investigate the allegations and claims asserted against NSL; particularly because of the Holidays. Plaintiff has no opposition to NSL’s request for an

1 extension until January 25, 2019 to file an answer or otherwise respond to Plaintiff's First
2 Amended Complaint.

3 This is the first stipulation for extension of time for NSL to respond to Plaintiff's First
4 Amended Complaint and is being made in good faith and not for purposes of undue delay. No
5 additional requests for extensions are contemplated.

6 **IT IS SO STIPULATED.**

7 Dated this 24th day of December 2018.

8 **HOLLEY, DRIGGS, WALCH, FINE,**
9 **PUZEY STEIN & THOMPSON**

10 */s/ Michael R. Ayers*
11 JAMES W. PUZEY, ESQ.
12 MICHAEL R. AYERS, ESQ.
13 ANDREA GANDARA, ESQ.
14 800 S. Meadows Parkway, Suite 800
Reno, Nevada 89521
Attorneys for Defendant
NAVIENT SOLUTIONS, LLC

15 Dated this 24th day of December 2018.

16 **HAINES & KRIEGER, LLC**

17 */s/ David H. Krieger,*
18 DAVID H. KRIEGER, ESQ.
19 8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Attorneys for Plaintiff

20 **ORDER**

21 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up
22 to and including January 25, 2019 is so ORDERED AND ADJUDGED.

23 Dated this 4th day of January, 2019.

24 
25
26 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of December, 2018, I served a copy of the foregoing
STIPULATION AND ORDER EXTENDING DEADLINE FOR NAVIENT SOLUTIONS, LLC TO FILE AN ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT upon the party below via electronic service through the United States District Court for the District of Nevada's ECF system:

David H. Krieger, Esq.
HAINES & KLRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Attorney for Plaintiff

By: /s/ SUSAN M. MATEJKO
An Employee of Holley Driggs Walch Fine
Puzey Stein & Thompson